

Peter G. Bertling (SBN 131602)
Jemma Parker Saunders (SBN 227962)
Bertling Law Group
21 East Canon Perdido Street, Suite 204B
Santa Barbara, CA 93101
Telephone: 805-879-7558
Facsimile: 805-962-0722
peter@bertlinglawgroup.com
jemma@bertlinglawgroup.com

Attorneys for Defendants
WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;
ALAMEDA COUNTY FEMALE
PRISONERS And Former Prisoners, JACLYN
MOHRBACHER, ERIN ELLIS, DOMINIQUE
JACKSON, CHRISTINA ZEPEDA, ALEXIS
WAH, AND KELSEY ERWIN, et al on behalf
of themselves and other similarly situated,

Plaintiffs,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;
WELLPATH MANAGEMENT, INC., a
Delaware Corporation (formerly known as
California Forensic Medical Group) a
corporation; its Employees and Sub-
Contractors, and Rick & Ruth ROEs Nos. 26-
50; **ARAMARK CORRECTIONAL**
SERVICES, LLC, a Delaware Limited
Liability Company; its Employees and Sub-
Contractors, and Rick & Ruth ROES Nos.
51-75,

Defendants.

Case No.: 3:19-cv-07423 JSC

**DECLARATION OF PETER G.
BERTLING IN SUPPORT OF
DEFENDANT WELLPATH'S
MOTION TO ENLARGE TIME
FOR COMPLIANCE OF COURT
ORDER (ECF NO. 328)**

Action Filed: November 12, 2019
Judge: Hon. Jacqueline Scott Corley
Ctrm: E—15th Floor

3:19-cv-07423 JSC

**DECLARATION OF PETER G. BERTLING IN SUPPORT OF DEFENDANT WELLPATH'S
MOTION TO ENLARGE TIME FOR COMPLIANCE OF COURT ORDER (ECF NO. 328)**

1 I, Peter G. Bertling declare:

2 1. I am an attorney licensed to practice before all Courts of the State of California
3 and before this District Court. I am the owner of Bertling Law Group, counsel of record
4 for Defendant Wellpath in this action. The facts set forth in this declaration are based on
5 my personal knowledge.

6 2. Immediately upon receipt of the Order on Wellpath's request for clarification,
7 my office worked to compile a revised list of Wellpath's percipient witnesses in
8 connection with the October 2, 2023 Order. Paring the list down from approximately
9 130 witnesses has been time-consuming and challenging.

10 3. My office and I have been in regular communication with staff at the Santa
11 Rita Jail endeavoring to ascertain the information to achieve full compliance with the
12 Court's Orders at ECF Nos. 328 and 331. At the time of the execution of this declaration
13 we have received information from 12 of the 37 witnesses, with none having any
14 recollection of any plaintiff outside of their medical notes.

15 4. My office and I will continue to diligently work on achieving compliance with
16 this Court's Order and within the next few days and by Monday, October 9, 2023, we
17 may well have a full response. However, out of an abundance of caution, and due to
18 witnesses' schedules, Wellpath seeks an extra two days to obtain the final compilation.

19 I declare under penalty of perjury under the laws of the United States of America
20 and the State of California that the forgoing is true and correct and that if called to do, I
21 could and would competently testify thereto. Executed on October 6, 2023, at Santa
22 Barbara, California.

23 /s/ Peter G. Bertling

24 Peter G. Bertling

25 Declarant
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